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12 **UNITED STATES BANKRUPTCY COURT**
13 **CENTRAL DISTRICT OF CALIFORNIA, SANTA ANA DIVISION**

14 In re
15 The Litigation Practice Group P.C.,
16 Debtor.

Case No. 8:23-bk-10571-SC

Chapter 11

**STIPULATION MODIFYING
MEDIATION AND SETTLEMENT
CONFERENCE REQUIREMENT
CONCERNING EARN-OUT DISPUTE**

Judge: Hon. Scott C. Clarkson
Date: [No Hearing Required]
Time: [No Hearing Required]
Place: Courtroom 5C
411 W. Fourth Street
Santa Ana, CA 92701

17 Richard A. Marshack, Liquidation Trustee of the LPG Liquidating Trust (the “Trustee”), on
18 the one hand, and Morning Law Group P.C. (“MLG”), (MLG and Trustee, taken together, the
19 “Parties”), on the other hand, hereby enter into this stipulation (“Stipulation”).

RECITALS

20 A. On April 21, 2025, the Court entered an order [Docket No. 2397] (the “Stipulated
21 Order”) approving a stipulation [Docket No. 2388] that resolved certain disputes with respect to the
22 payment of undisputed amounts under the *Agreement of Purchase and Sale and Joint Escrow*
23 *Instructions* [Docket No. 416] (the “PSA”) by and among the Parties.

24 B. Pursuant to the stipulation and Stipulated Order, the Parties desired and agreed to

1 participate in a one-day mediation or settlement conference regarding the Earn-Out Dispute (as
2 defined in the Stipulated Order) not later than July 1, 2025. The Parties further agreed to participate
3 in informal discovery in advance of such mediation or settlement conference, which has yet to take
4 place as of the date of this Stipulation.

5 C. On June 13, 2025, Todd C. Ringstad, Esq. of Ringstad & Sanders LLP substituted
6 [Docket No. 2444] in as counsel to MLG. Since the substitution, the Parties have been in discussions
7 concerning alternative approaches to resolution of the Earn-Out Dispute. Additionally, Mr. Ringstad
8 requires a reasonable time to familiarize himself with the issues related to the Earn-Out Dispute.

9 D. Based on the foregoing, the Parties believe that the interests of efficient management
10 of the Earn-Out Dispute and related informal settlement discussions counsel in favor of holding the
11 settlement conference or mediation deadline in abeyance, and, based thereon, agree to enter into this
12 Stipulation.

13 **STIPULATION**

14 The Parties hereby stipulate and agree as follows:

- 15 1. The foregoing recitals are incorporated herein by this reference.
- 16 2. The Parties agree to modify the Stipulated Order solely to waive the requirement that
17 the Parties participate in mediation or settlement conference related to the Earn-Out Dispute no later
18 than July 1, 2025.
- 19 3. This Stipulation is without prejudice to either or both Parties seeking a further order
20 from the Court concerning mediation of the Earn-Out Dispute.

21 *[The remainder of this page is intentionally blank.]*
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4. All other terms of the Stipulated Order shall remain in full force and effect.

DATED: June 26, 2025

FOX ROTHSCHILD LLP

By: /s/ Nicholas A. Koffroth

KEITH C. OWENS

NICHOLAS A. KOFFROTH

*Attorneys for Richard A. Marshack, Liquidation
Trustee of the LPG Liquidating Trust*

DATED: June 26, 2025

RINGSTAD & SANDERS LLP

By: 

TODD C. RINGSTAD

Attorneys for Morning Law Group P.C.

SAUL EWING LLP
1888 CENTURY PARK EAST, SUITE 1500
LOS ANGELES, CALIFORNIA 90067
(310) 255-6100

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is 10250 Constellation Boulevard, Suite 900, Los Angeles, CA 90067.

A true and correct copy of the foregoing documents entitled: STIPULATION MODIFYING MEDIATION AND SETTLEMENT CONFERENCE REQUIREMENT CONCERNING EARN-OUT DISPUTE on the judge in chambers in the form and manner required by LBR 5005-2(d); and (b) in the manner stated below:

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On 6/26/2025, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

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- **Johnny White** JWhite@wrslawyers.com, jlee@wrslawyers.com
- **Reina Zepeda** rzepeda@omniagnt.com

2. SERVED BY UNITED STATES MAIL: On 6/26/2025, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows.

See attached for additional parties

3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (state method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on 6/26/2025, I served the following persons and/or entities by personal delivery, mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

The Honorable Scott C. Clarkson
United States Bankruptcy Court, Central District of California
411 West Fourth Street, Suite 5130 / Courtroom 5C
Santa Ana, CA 92701-4593

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

6/26/2025

Kimberly Hoang

/s/ Kimberly Hoang

Date

Printed Name

Signature

Additional Parties Served by U.S. Mail

Creditors who have the 20 largest unsecured claims

Debt Validation Fund II, LLC
5075 Lower Valley Road,
Atglen, PA 19310

MC DVI Fund 1, LLC; MC
DVI Fund 2, LLC
598 Cottonwood Dr.,
Glenview, IL 60026

Validation Partners LLC
1300 Sawgrass Pkwy, Ste. 110
Sunrise, FL 33323

Marich Bein LLC
99 Wall Street, Ste 2669
New York, NY 10005

Business Centers of America
1100 Sir Francis Drake Blvd,
Ste 1, Kentfield, CA 94904

JP Morgan Chase
3 Park Plaza, Ste 900
Irvine, CA 92614

CA Franchise Tax Board
PO Box 942857
Sacramento, CA 94257-0511

Outsource Accelerator Ltd
City Marque Limited
Unit 8801-2 Bldg. 244-248
Des Voeux Rd.
Central Hong Kong

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400 Dorla Court
Zephyr Cove, NV 89448

Anthem Blue Cross
PO Box 511300
Los Angeles, CA 90051-7855

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2 420 Adobe Canyon Rd.
3 Kenwood, CA 95452

4 Debt Pay Pro
5 1900 E Golf Road, Suite 550
6 Schaumburg, IL 60173

7 Sharp Business Systems
8 8670 Argent St
9 Santee, CA 92071

10 Tustin Executive Center
11 1630 S Sunkist Steet, Ste A
12 Anaheim, CA 92806

13 Exela Enterprise Solutions
14 2701 E. Grauwlyer Road
15 Irving, TX 75061

16 Netsuite-Oracle
17 2300 Oracle Way
18 Austin, TX 78741

19 Credit Reporting Service Inc
20 548 Market St, Suite 72907
21 San Francisco, CA 94104-5401

22 Document Fulfillment Services
23 2930 Ramona Ave #100
24 Sacramento, CA 95826

25 Executive Center LLC
26 5960 South Jones Blvd
27 Las Vegas, NV 89118

28 LexisNexus
15500 B Rockfield Blvd
Irvine, CA 92618

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Sunny Isles, FL 33154

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Bay Harbour Islands, FL 33154